University of Georgia Tifton Campus
Horticulture Building
4604 Research Way
Tifton, Georgia 31793
E-mail address: kemerait@uga.edu• 229-386-3355 Phone

19 March 2020

US EPA

Dear Sir/Madam,

My name is Robert Kemerait and I am an Extension specialist at the University of Georgia assigned responsibility for management of nematodes and diseases affecting peanuts and other agronomic crops. I have been in this position since 2000. As I have learned that the EPA registration for oxamyl (Vydate CLV) for peanut is in jeopardy, I am writing this unsolicited letter to you in support of the continued registration of oxamyl for use by peanut growers in Georgia. I am grateful to have this opportunity.

Plant-parasitic nematodes are an important and increasingly difficult pest problem affecting peanut production in Georgia. The magnitude of this importance is based upon three critical factors. First, there continues to be a razor-thin margin of profit for peanut farmers and complications from seed-quality issues have put tremendous pressure on doing everything we can to protect the crop's vigor, root development, and plant stand early in the season. Plant parasitic nematodes take these away from a peanut crop. Second, because of the abysmal price of our other major row-crop, cotton, growers are increasingly planting peanuts on short rotations out of economic necessity. The absolute need to plant peanuts in a field more often further exacerbates the problems with nematodes. Third, we are increasingly aware that it is not only the peanut root-knot nematode (*Meloidogyne arenaria*) but is now also the lesion nematode (*Pratylenchus* sp.) that is destructive to peanuts in our state.

Although varieties of peanut have been developed with resistance to the peanut root-knot nematode, these varieties suffer a significant yield-drag as compared to susceptible varieties and are NOT resistant to the lesion nematode. Our peanut production areas hardest hit by nematodes are also our areas of greatest peanut production. Fumigation with Telone II is not an option for most of our peanut producers, and other products, to include Velum Total and AgLogic 15G, may simply not be robust enough under the kind of nematode pressure faced by the growers in those regions. Deficiencies in good options for nematode management cripple a growers' opportunity to adequately protect the crop, protect yields, and protect profit. The decision to limit pegging-time applications of aldicarb (AgLogic 15G) has left our growers with even fewer options to fight nematodes effectively.

Oxamyl (sold as Vydate CLV) is a versatile and affordable nematicide that provides strength to our very small arsenal of products for combatting nematodes in our peanut fields. Oxamyl is a critical management option for our peanut growers for three reasons. First, oxamyl by itself is a good tool for the control of plant parasitic nematodes on peanut. Second, because of its liquid formulation, there is great versatility in the application strategies for use of oxamyl; opportunities that do not require either pre-plant fumigation or the use of granular hopper boxes. Third, the opportunity to use Vydate CLV and Velum Total together in a peanut nematode management program creates a more robust and more effective program for our peanut farmers. The program is more robust in its opportunity to protect against root-knot and lesion nematodes.

Given all of the pressure that our peanut farmers currently face, from nematodes, from seed quality issues, from climate change, from hurricanes, and from low commodity prices, NOW is the time help farmers in their battles to

manage important, yield-limiting, pests. Now is a critical time to protect their ability to fight and to protect profit; now is not the time to take tools away from them.

Thank you for this opportunity to submit this letter in support of the continued availability of oxamyl for our peanut farmers. Please do not hesitate to contact me with further questions.

Sincerely,

Robert C. Kemerait Jr.

Robert C. Kemerait Jr., PhD
Professor and Extension Specialist
E-mail: kemerait@uga.edu
Phone: 229-386-3355